

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

DOCKET NO. 2003-326-C

IN RE:

Analysis of Continued Availability of	)
Unbundled Local Switching for Mass Market	)
Customers Pursuant to the Federal	)
Communication Commission's Triennial	)
Review Order	)

**COMPETITIVE CARRIERS OF THE SOUTH, INC.'S  
SECOND SET OF INTERROGATORIES  
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

Competitive Carriers of the South, Inc. ("CompSouth"), hereby serves its Second Set of Interrogatories to BellSouth Telecommunications, Inc. ("BellSouth").

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc. and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth.

2. The terms "you" and "your" refer to BellSouth.

3. "CompSouth" means Competitive Carriers of the South, Inc., their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of CompSouth.

## INSTRUCTIONS

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

4. These document requests are continuing in nature and pursuant to the Rules and Regulations of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure require supplemental responses should additional documents become available.

### INTERROGATORIES

23. Provide, for each state in your region, a copy of the completed Part II (Wireline and Fixed Wireless Local Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of June 2003.

24. For each state in your region, provide the information requested in Part II (Wireline and Fixed Wireless Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of September 2003.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: 

Robert E. Tyson, Jr.  
1310 Gadsden Street (29201)  
Post Office Box 11449  
Columbia, South Carolina 29211  
Telephone: (803) 929-1400  
[rtyson@sowell.com](mailto:rtyson@sowell.com)

Attorneys for Competitive Carriers of the  
South, Inc. ("CompSouth")

Columbia, South Carolina

December 29, 2003

## **CERTIFICATE OF SERVICE**

I, the undersigned of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for Competitive Carriers of the South, Inc. ("CompSouth"), do hereby certify that I have a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

**Pleadings:** **Competitive Carriers of the South, Inc.'s Second Set of Interrogatories to BellSouth Telecommunications, Inc.**

**Counsel Served:** Elliott F. Elam, Jr. Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, South Carolina 29250-5757  
[Elam@dca.state.sc.us](mailto:Elam@dca.state.sc.us)  
Counsel for Intervenor Consumer Advocate

John J. Pringle, Jr., Esquire  
Ellis, Lawhorne & Sims, P.A.  
1501 Main Street, Fifth Floor  
Post Office Box 2285  
Columbia, South Carolina 29202  
[jpringle@ellislawhorne.com](mailto:jpringle@ellislawhorne.com)  
Counsel for Intervenor AT&T Communications of the Southern States, L.L.C. ("AT&T") and Access Networks, Inc.

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, South Carolina 29202  
[patrick.turner@bellsouth.com](mailto:patrick.turner@bellsouth.com)  
Counsel for BellSouth Telecommunications, Inc.  
("BellSouth")

F. David Butler, Esquire  
South Carolina Public Service Commission  
Post Office Drawer 11649  
Columbia, South Carolina 29211  
[david.butler@psc.state.sc.us](mailto:david.butler@psc.state.sc.us)

The Honorable Bruce Duke  
Acting Executive Director  
South Carolina Public Service Commission  
Post Office Drawer 11649  
Columbia, South Carolina 29211  
[bruce.duke@psc.state.sc.us](mailto:bruce.duke@psc.state.sc.us)

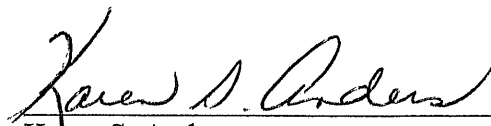
Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, L.L.C.  
Post Office Box 11449  
Columbia, South Carolina 29211  
[rtyson@sowell.com](mailto:rtyson@sowell.com)  
Counsel for Intervenors Competitive Carriers of the South,  
Inc. ("CompSouth"); ITC^DeltaCom Communications, Inc.  
("ITC^DeltaCom") and Momentum Business Solutions, Inc.

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
Post Office Box 12399  
Columbia, South Carolina 29211  
[dwcothran@wchl.com](mailto:dwcothran@wchl.com)  
Counsel for Intervenors MCI WorldCom Communications,  
Inc., Intermedia Communications, Inc. and MCIMetro Access  
Transmission Service, LLC

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
[jbowen@mcnair.net](mailto:jbowen@mcnair.net)  
[pfox@mcnair.net](mailto:pfox@mcnair.net)  
Counsel for Intervenor The South Carolina Telephone  
Coalition

Scott Elliott, Esquire  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, South Carolina 29205  
[selliott@mindspring.com](mailto:selliott@mindspring.com)  
Counsel for Intervenors United Telephone Company of the  
Carolinas and Sprint Communications Company, L.P.

Also e-mail:  
[daphne.werts@psc.state.sc.us](mailto:daphne.werts@psc.state.sc.us)  
[deborah.easterling@psc.state.sc.us](mailto:deborah.easterling@psc.state.sc.us)  
[florence.belser@psc.state.sc.us](mailto:florence.belser@psc.state.sc.us)

A handwritten signature in cursive script, reading "Karen S. Anders", written over a horizontal line.

Karen S. Anders  
Litigation Paralegal

December 29, 2003